

1 Steve W. Berman (Pro Hac Vice)
 2 HAGENS BERMAN SOBOL SHAPIRO LLP
 3 1918 Eighth Avenue, Suite 3300
 4 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594
 steve@hbsslaw.com

5 Bruce L. Simon (SBN 96241)
 6 PEARSON SIMON WARSHAW & PENNY, LLP
 7 44 Montgomery Street, Suite 2450
 San Francisco, CA 94104
 Telephone: (415) 433-9000
 Facsimile: (415) 433-9008
bsimon@pswplaw.com

9 *Plaintiffs' Interim Co-Lead Counsel*

10 [Additional Counsel listed on
 Signature Page]

1 RODGER R. COLE (CSB No. 178865)
rcole@fenwick.com
 2 MOLLY R. MELCHER
 (CSB No. 272950)
mmelcher@fenwick.com
 3 FENWICK & WEST LLP
 Silicon Valley Center
 801 California Street
 Mountain View, CA 94041
 Telephone: 650.988.8500
 Facsimile: 650.938.5200

5 TYLER G. NEWBY (CSB No. 205790)
tnewby@fenwick.com
 6 JENNIFER J. JOHNSON
 (CSB No. 252897)
jjjohnson@fenwick.com
 7 FENWICK & WEST LLP
 555 California Street, 12th Floor
 San Francisco, CA 94104
 Telephone: 415.875.2300
 Facsimile: 415.281.1350

9 *Attorneys for Defendant
 Carrier IQ, Inc.*

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

18 *In re Carrier IQ, Inc. Consumer Privacy
 19 Litigation*

20 [This Document Relates to All Cases]

21 Case No. C-12-md-2330-EMC

22 **STIPULATION AND [PROPOSED]
 ORDER FOR CONTINUANCE OF
 TIME FOR PLAINTIFFS TO FILE A
 STIPULATION REGARDING ENTRY
 OF A PROTECTIVE ORDER**

24 **STIPULATION**

25 This Stipulation and [Proposed] Order is entered into by and between Plaintiffs' Interim
 26 Co-Lead Counsel and Defendants' counsel (collectively, the "Parties") as follows:

27 WHEREAS, the deadline for Plaintiffs to file a stipulation regarding the entry of a
 28 protective order was August 13, 2012;

WHEREAS, on August 10, 2012, the Parties filed a stipulation and [proposed] order to continue the deadline for Plaintiffs to file a stipulation regarding the protective order until 14 days after the filing of the consolidated, amended complaint on August 27, 2012 (Dkt. No. 105);

WHEREAS, on August 14, 2012, this Court granted the stipulation (Dkt. No. 106);

WHEREAS, the Parties have met and conferred in good faith regarding the terms of a stipulated protective order and believe that an additional week will allow the parties to meet and confer further and to resolve or substantially reduce the remaining items in dispute;

NOW THEREFORE, the Parties, by and through their respective counsel of record, hereby stipulate, subject to Court approval, as follows:

The deadline for Plaintiffs to file a stipulation regarding the entry of a protective order currently set for September 10, 2012 is continued to September 17, 2012.

IT IS SO STIPULATED.

Dated: September 10, 2012

By: /s/ Robert F. Lopez
STEVE W. BERMAN
HAGENS BERMAN SOBOL SHAPIRO LLP
Robert F. Lopez (Pro Hac Vice)
Thomas E. Loeser (202724)
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com
robl@hbsslaw.com
toml@hbsslaw.com

Jeff D. Friedman (173886)
Shana E. Scarlett (217895)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
jefff@hbsslaw.com
shanas@hbsslaw.com

By: /s/ Daniel L. Warshaw
Daniel L. Warshaw (SBN 185365)
PEARSON SIMON WARSHAW & PENNY,
LLP
15165 Ventura Blvd., Suite 400
Sherman Oaks, CA 91403

1 Telephone: (818) 788-8300
 2 Facsimile: (818) 788-8104
dwarshaw@pswplaw.com

3 Bruce L. Simon (SBN 96241)
 4 William J. Newsom (SBN 267643)
 5 44 Montgomery Street, Suite 2450
 6 PEARSON SIMON WARSHAW & PENNY,
 7 LLP
 8 San Francisco, CA 94104
 9 Telephone: (415) 433-9000
 10 Facsimile: (415) 433-9008
 11 bsimon@pswplaw.com
 12 wnewsom@pswplaw.com

13 *Plaintiffs' Interim Co-Lead Counsel*

14 By: /s/ Tyler G. Newby
 15 Tyler G. Newby (CSB No. 205790)
tnewby@fenwick.com
 16 Jennifer J. Johnson (CSB No. 252897)
jjjohnson@fenwick.com
 17 FENWICK & WEST LLP
 18 555 California Street, 12th Floor
 19 San Francisco, CA 94104
 20 Ph: (415) 875-2300
 21 Fax: (415) 281-1350

22 Rodger R. Cole (CSB No. 178865)
rcole@fenwick.com
 23 Molly R. Melcher (CSB No. 272950)
mmelcher@fenwick.com
 24 FENWICK & WEST LLP
 25 801 California Street
 26 Mountain View, CA 94041
 27 Ph: (650) 988-8500
 28 Fax: (650) 938-5200

29 *Attorneys for Defendant Carrier IQ, Inc.*

30 By: /s/ Rosemarie T. Ring
 31 Rosemarie T. Ring (SBN 220769)
Rose.Ring@mto.com
 32 Jonathan H. Blavin (SBN 230269)
Jonathan.Blavin@mto.com
 33 Bryan H. Heckenlively (SBN 279140)
Bryan.Heckenlively@mto.com
 34 MUNGER, TOLLES & OLSON, LLP
 35 560 Mission Street
 36 Twenty-Seventh Floor
 37 San Francisco, CA 94105-2907

FENWICK & WEST LLP
 ATTORNEYS AT LAW
 MOUNTAIN VIEW

1 Phone: (415) 512-4000
2 Fax: (415) 512-4077

3 Henry Weissmann (SBN 132418)
4 Henry.Weissmann@mto.com
5 MUNGER, TOLLES & OLSON, LLP
6 355 South Grand Avenue,
Thirty-Fifth Floor
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

7 *Attorneys for Defendant HTC America, Inc.*

8 By: /s/ Simon J. Frankel

9 Simon J. Frankel
sfrankel@cov.com
10 Mali B. Friedman
mfriedman@cov.com
11 COVINGTON & BURLING LLP
1 Front St., 35th Floor
12 San Francisco, CA 94111
Phone: (415) 591-6000
13 Fax: (415) 591-6091

14 *Attorneys for Defendant Huawei Devices USA,
Inc.*

16 By: /s/ James Donato

17 James Donato (SBN (146140)
jdonato@shearman.com
18 SHEARMAN & STERLING LLP
Four Embarcadero Center, Suite 3800
19 San Francisco, CA 94111-5994
Phone: (415) 616-1100
20 Fax:(415) 616-1199

21 *Attorneys for Defendant LG Electronics
MobileComm U.S.A., Inc.*

22 By: /s/ Norman K. Beck

23 Peter C. McCabe III
pmccabe@winston.com
24 Norman K. Beck
nbeck@winston.com
25 Scott T. Sakiyama
ssakiyama@winston.com
26 WINSTON & STRAWN LLP
35 W. Wacker Drive
27 Chicago, IL 60601-9703
28 Phone: (312) 558-5600

1 Fax: (312) 558-5700

2 Richard A. Lapping (SBN: 107496)
3 rlapping@winston.com
4 WINSTON & STRAWN LLP
5 101 California Street
6 San Francisco, CA 94111-5894
7 Telephone: (415) 591-1000
8 Facsimile: (415) 591-1400

9
10 *Attorneys for Defendant Motorola Mobility LLC*

11 By: /s/ Wayne M. Helge

12 Wayne M. Helge
13 whelge@park-law.com
14 H.C. Park & Associates, PLC
15 8500 Leesburg Pike, Suite 7500
16 Vienna, VA 22182
17 Phone: (703) 288-5105
18 Fax: (703) 288-5139

19 *Attorneys for Defendant Pantech Wireless, Inc.*

20 By: /s/ Lance A. Etcheverry

21 Lance A. Etcheverry
22 lance.etcheverry@skadden.com
23 300 South Grand Avenue, Suite 3400
24 Los Angeles, California 90071
25 Phone: (213) 687-5000
26 Fax:(213) 687-5600

27 *Attorneys for Defendant Samsung*
28 *Telecommunications America, LLC*

ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Molly R. Melcher, am the ECF User whose identification and password are being used to file this **STIPULATION AND [PROPOSED] ORDER FOR CONTINUANCE OF TIME FOR PLAINTIFFS TO FILE A STIPULATION REGARDING ENTRY OF A PROTECTIVE ORDER.** In compliance with General Order 45.X.B, I hereby attest that all signatories have concurred in this filing.

Dated: September 10, 2012

/s/ *Molly R. Melcher*

Molly R. Melcher

[PROPOSED] ORDER

Pursuant to stipulation, it is SO ORDERED.

9/15/12

9/13/12

